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December 17, 2021

SO ORDERED.

By ECF and Facsimile

The Honorable Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

/s/ Alvin K. Hellerstein
December 20, 2021

Re: U.S. v. Johan Araujo, 20 CR 600-AKH – Motion to Modify Bail Conditions

Dear Judge Hellerstein:

I represent Johan Araujo in the above-referenced matter. I am writing to request that the Court remove home detention and location monitoring from the conditions of his release on bail. Pretrial Services approves this modification.

On July 23, 2021, Mr. Araujo was arrested in this matter. At his initial appearance, Magistrate Judge Katherine H. Parker granted bail subject to, *inter alia*, a \$150,000 personal recognizance bond co-signed by three sureties, strict pretrial supervision, home detention enforced by location monitoring, and surrender of travel documents. (*See* ECF Doc. No. 35).

Since his release on bail, Mr. Araujo has been fully compliant with the conditions of his release. Additionally, on October 22, 2021, he obtained full-time employment as a housekeeper at the Ryan Chelsea-Clinton medical clinic, which is located at 645 10th Avenue in Manhattan.

Removing the condition of home detention with electronic monitoring would satisfy the standard set forth in the Bail Reform Act. *See* 18 U.S.C. 3142(c) (judicial officer shall order the defendant's release subject to the "least restrictive" combination of conditions that will reasonably assure the defendant's appearance and the safety of the community). Mr. Araujo is 40 years old and has no prior record. He has resided at his current address in Manhattan for more than 20 years. By complying with the conditions of his release and obtaining employment, Mr. Araujo has demonstrated that he does not present a danger to the community while released on bail. Additionally, as a U.S. citizen who has lived in New York for approximately 30 years, Mr. Araujo does not present a flight risk. He has surrendered his passport to Pretrial Services. If the requested modification is granted, his travel would continue to be restricted to the Southern and Eastern Districts of New York and the Eastern District of Pennsylvania, where one of his children resides. Accordingly, removing the home detention and electronic monitoring from the conditions of Mr. Araujo's pretrial release would be consistent with the standard set forth in the Bail Reform Act.

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As noted above, Pretrial Services believes that this modification of Mr. Araujo's conditions is appropriate. The government opposes this request.

Thank you for your attention.

Respectfully,

A handwritten signature in blue ink, appearing to read "Zachary S. Taylor".

Zachary S. Taylor

cc: Andrew Chan, Esq.
Mathew Andres, Esq.
Assistant United States Attorneys
Joshua Rothman
Intensive Supervision Specialist, Pretrial Services (*by email*)